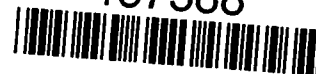


FM: RIGG@adeq.state.ar.us, 09/06/2002 02:02 PM
TO: Robert Werner/R6/USEPA/US@EPA
Subj: FW: sitehistory

157388



-----Original Message-----

From: Etzkorn, Dan
Sent: Tuesday, September 03, 2002 3:04 PM
To: Rigg, Jim; Foster, Melanie
Subject: FW: sitehistory

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-----Original Message-----

From: Hartley, David
Sent: Friday, August 30, 2002 3:42 PM
To: Etzkorn, Dan
Subject: sitehistory

Here is what I have on Cedar site history.

sitehistory



sitehistory.wpd

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Site History

Prior to 1970 the site was used as cultivated farmland.

1970

- **Helena Chemical Corporation acquired the site and construction of a chemical plant for the manufacture of Propanil herbicide¹.**
- **A man named Kencade started manufacturing Methoxychlor at the site³.**

1971

- **Propanil manufacturing began with a proclaimed production capacity of 185,000-200,000 gallons per month².**
- **Plant was sold to J.A. Williams who in turn sold the plant to Eagle River Chemical Corporation who was reported to be a newly formed AR corporation (September 1971) that was initially controlled (2/3 stock ownership) by the Ansul Company. DNBP production was added.**
- **Transvaal Inc. purchases and operates the phenoxy herbicide facilities of Hercules Inc. in Jacksonville AR.**

1972

- **Ansul Company sold its majority stock interest in Eagle River back to J.A. Williams as the sole shareholder. Eagle River was subsequently merged into VERTAC Inc.**
- **Vicksburg Chemical Company purchases Amax Chemical Corporation and Gulf Oil Chemical facilities and began production of DNBP in Vicksburg MS.**
- **Three drum disposal burial pits, two disposal ponds, and other product or trash disposal sites constructed by Ansul ¹.**

1973

- **Ansul Company sells stock interest November 1973**

1976

- Helena Chemical Company was reported to be disposing "wash water" into unlined ponds on the site³.

1977

- Helena Chemical Company was reported to be disposing "wash water" into unlined ponds on the site³.

1978

- Three unlined ponds closed.
- VERTAC takes over operations December 31, 1978

1979

- Priority Pollutant Analysis of NPDES Permit AR0036412 effluent by EPA (Mississippi River Outfall)

1980

- VERTAC files filed a hazardous waste management facility application (Part A) for surface impoundments

1984

- VERTAC files Part B hazardous waste permit application for surface impoundments August 15, 1984.
- VERTAC withdraws Part B on November 1, 1984 on the basis that surface impoundments have never received hazardous waste
- ADPC&E acknowledged Part B withdrawal November 16, 1984 constituting a final administrative decision terminating interim status.

1985

- Ecology and Environment Dioxin Sampling memo to EPA Region 6 - no TCDD indicated

1986

- **Cedar Chemical Corporation acquired the site from VERTAC.**
- VERTAC's Part B application assigned to Cedar (January 9, 1986)
- ADPC&E CEI (May 30, 1986) finds thirteen discharges of hazardous waste into biological treatment system-no interim status.
- ADPC&E Notice of Violation Discharges to biological treatment system leads to CAO LIS 86-027 (July 17, 1986).
- Ecology and Environment Inc. Sampling Mission for EPA Region 6 indicating extensive contamination with pesticides and other organic compounds.
- Manufacturing operations included methymil, permethrin, cypermethrin, and a hydrocarbon polymer consisting of kerosene and Isonax 132. Extensive yellow-stained soil reported. Contaminants detected: 4,4-DDT; Methoxychlor; Aldrin; Dieldrin; Chlordane; 4,4-DDE; 1,2 Dichloroethane; Phenol; Bis(2-ethyl hexyl)phthalate; 1,2 Dichlorobenzene; Gamma-BHC; Toluene; Ethylbenzene; Chlorobenzene; Xylenes; and 2-Hexanaone.

1988

- Hydrogeologic Study conducted by Grubbs, Garner and Hoskyn Inc.
- CCC reports of Non-compliance (Stormwater)
- Surface Impoundment Sampling and Analysis Report prepared by Sorrells Research Laboratory

1989

- Ground water monitoring wells installed
- NPDES Permit AR0036412 Notice of Violations EPA (Stormwater)
- ADPC&E Groundwater sampling detects: Methoxybenzene, Dichlorobenzene, Chloroaniline, Dichloroanilines, Pheny laniline, and elevated TOC
- Contingency plan implemented on September 25, 1989-reactor vessel explosion

1990

- NPDES Permit AR0036412 Renewed
- ADPC&E Groundwater sampling detects: 1,2 Dichlorbenzene; Dichloroanilines, Propanil, Bromacil, and elevated TOC
- CCC notifies ADPC&E that drum disposal discovered and requests assistance (April 6, 1990)

1991

- CCC Reports of Non-compliance (several) to NPDES Permit AR0036412 (Stormwater)
- CCC Reports significant lethality in biomonitoring to NPDES (Stormwater)
- NPDES Permit AR0036412 Notices (several) of Violation
- CCC enters into CAO LIS 91-118 with ADPC&E Hazardous Waste Division for expanded investigation and corrective actions for releases to soils and groundwater

1990

- CCC identifies drum disposal areas present in an area for proposed plant expansion (DCA Unit) and approaches ADPC&E desiring to remove drum disposal area.
- Site characterization report identifies drum disposal areas and relocated DCA tank farm to avoid construction over highly contaminated soils⁴. ADPC&E clearly expressed a need for interim corrective action at other sites as well (May 9, 1990) and advises no piece-meal corrective action approval, facility wide corrective actions needed. CCC proceeds with removal absent of ADPC&E approval.
- ADPC&E advises CCC that the final Groundwater Report for CAO LIS 86-027 is incomplete (lacks final engineering report) and is in violation of the CAO(July 25, 1990).
- CCC submits final engineering report (August 4, 1990) admitting that there is leakage from the biological treatment ponds into groundwater.

1992

- ADPC&E conditionally approves RFI Preliminary Report December 15, 1992

1993

- ADPC&E conditionally approves RFI Workplan June 1, 1993

1994

- ADPC&E approves CCC's Plan for Implementation of Interim Measures requiring measures for groundwater contamination. ADPC&E points out that 1,2-Dichloroethane contaminated groundwater fails toxicity characteristics at property line. Also ADPC&E requires interim measure remediation plan for Sites 4, 9, and an off-site private water well survey (August 25, 1994)
- CCC objects to interim measures on the basis of the lack of receptor (extent of contamination deficiency issue) and proposed

additional investigation

1995

- Remedial Facility Investigation Report submitted March 1995
- ADPC&E NOD RFIR June 1995
- Interim Response Work Plan submitted April 10, 1995

1997

- ADPC&E approves Remedial Facility Investigation Report (June 1997) and requires a CMS for Sites 1, 2, 3, 4, 5, 6, 8, and 9. CMS required to include a minimum of biological and thermal treatment of soils. Additionally, an imminent threat to health and safety was declared requiring the following interim measures: remove all buried drums from the drum vault, control and complete plume delineation including long term GWM and contingencies for control, control releases from biological treatment ponds into groundwater, complete integrity assessments of all process sumps wastewater piping. Interim measures plan required.
- Plant fire incident 10-6-97

1998

- RA Workplan (Protocol) submitted May 11, 1998
- ADPC&E issues NOD on RA Workplan (Protocol), September 21, 1998

1999

- ADEQ approves Risk Assessment Protocol with conditions and exceptions, April 23, 1999
- ADEQ grants time extension for RA and requests a schedule to complete corrective action selection by 2005, June 1, 1999
- Risk Assessment Report October 1999 submitted

2000

- ADEQ issues NOD regarding risk assessment May 15, 2001

2001

- Cedar agrees to expedite corrective action under the CAS program
- 9-27-01 Scoping meeting identify high priority corrective actions: groundwater in alluvial aquifer, east EDC source area, Site 2 groundwater leachability, Sites 3, 6 and 9 soils.

Associations:

J.A. Williams

- Reported to have purchased the plant from original builder of the chemical plant³.
- Chairman of VERTAC Inc. Billings, MT.

C.E. Formby

- President of Helena Chemical Company, Memphis, TN.
- Director of VERTAC Inc.

J.C. Bumpers

- Secretary-Treasurer, Director of VERTAC Inc.

N.D. Morgan, Jr.

- President of Vicksburg Chemical Company, Vicksburg MS
- President of Chemform Corporation, West Memphis AR
- President of Eagle River Chemical Corporation, West Helena AR
- President of Eagle Kaid Chemical Company, West Helena AR

Joe Porter

- Plant Chemical Engineer, last known address Memphis TN VERTAC Inc.

- Corporate Headquarters Billings MT
- Ansul Company
- Address unknown, former controlling interest in Eagle River Chemical Corporation, see Cedar Chemical Corporation v. Wormald U.S. Inc., Phillips County AR No. E-91-349
- Wormald U.S. Inc.
- Possibly predecessor of Ansul Company, address undnwn, Wormald paid for the excavation and removal of three drum disposal areas following lawsuit filed in Phillips County AR where CCC sought reimbursement
- Mobile Oil Company
- Contract NBE production-major source of groundwater EDC contamination

Notes:

- ¹ CCC Facility Investigation Preliminary Report, September 1992
- ² VERTAC Inc. Information Brochure
- ³ Ecology and Environment, Inc. Memo to EPA Region 6, July 1986
- ⁴ Site Characterization Report, June 1990, Woodward Clyde Consultants CAO LIS 86-027 (July 17, 1986) requires CCC to submit evidence of liability coverage for sudden accidental occurrences for 40 CFR 265.147(a)

Misc.

Transmissivity 16-7800 ft²/day from site specific, regional 10,000-35500 ft²/day

Gradient 0.0006ft/ft S-SW from site specific

Hyd Cond 247-329 ft/day

Flow Rate 840-2,320 gpm regional

Specific Capacity 120-129 gpm/ft regional

GW Velocity 0.82 ft/day